



Swartz Campbell LLC
One Liberty Place
1650 Market Street, 38th Floor
Philadelphia, PA 19103

Phone 215-299-4296
Fax 215-299-4301
cdougherty@swartzcampbell.com
www.swartzcampbell.com

Candidus K. Dougherty
Attorney at Law

April 16, 2021

VIA ECF

The Honorable Peggy Kuo
United States District Court for Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**RE: Rene Rothstein Rubin v. Michael P. Mangan, Esquire, et al.
USDC, Eastern District of New York, No. 1:21-cv-01401**

Dear Judge Kuo:

We represent defendants, Michael P. Mangan and Mangan & Ginsberg, LLP. This matter was transferred from the Eastern District of Pennsylvania on or about March 17, 2021.

We are writing to request a two-week adjournment of the Initial Conference scheduled to take place on April 21, 2021 at 11:00 a.m. The undersigned is not admitted to the Eastern District of New York and intends to move to be admitted pro hac vice. However, we have not yet received the needed certificate of good standing from the state of New Jersey to complete the application.

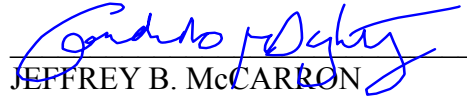
The New Jersey certificate was requested on March 26, 2021. We paid for expedited processing and overnight UPS return delivery. However, we were informed that the processing office was backlogged and that the certificate of good standing was mailed to our office on April 8, 2021, though we still have not received it as of the filing of this letter. We intend to move for admission promptly once the certificate arrives, but we are concerned it will not arrive before the conference next week. The undersigned has been handling the motion practice and conferences in this case and is the person most appropriate to attend the conference and be fully prepared to discuss discovery deadlines and all issues related to the case.

Additionally, we have also learned from Pennsylvania counsel for defendant, Michael Rothstein, that Mr. Rothstein is in the process of retaining New York counsel.

Plaintiff's counsel consented to the two-week adjournment request. Accordingly, we respectfully request a two-week adjournment of the Initial Conference to permit additional time for counsel to be admitted pro hac vice.

Very truly yours,

SWARTZ CAMPBELL LLC



JEFFREY B. McCARRON
CANDIDUS K. DOUGHERTY

JBM/CKD/CJS

cc: David S. Senoff, Esq (via e-mail)
Jerome M. Marcus, Esq (via e-mail)
Walter S. Zimolong, Esq. (via e-mail)